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**From:** Ogle, Kimberly [Ogle.Kimberly@epa.gov]  
**Sent:** 10/9/2019 11:47:40 PM  
**To:** McArthur, Lisa [McArthur.Lisa@epa.gov]  
**CC:** Mullin, Michelle [Mullin.Michelle@epa.gov]; Davies, Lauris [Davies.Lauris@epa.gov]  
**Subject:** RE: LAST MINUTE SUBITTAL for The Weekly: Sky Valley Education Center Inspection

Done.

Michelle: please ensure that the Field Notification Activity (on ECADs sharepoint) is filled out for this activity. If you cannot find it from the info page, call Rachel Stevenson or Jon Klemesrud. The ops directors troll this list to know what all is happening in their states. Thx.

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**From:** McArthur, Lisa <McArthur.Lisa@epa.gov>  
**Sent:** Wednesday, October 9, 2019 4:44 PM  
**To:** Ogle, Kimberly <Ogle.Kimberly@epa.gov>; Hamlin, Tim <Hamlin.Tim@epa.gov>  
**Cc:** Davies, Lauris <Davies.Lauris@epa.gov>  
**Subject:** RE: LAST MINUTE SUBITTAL for The Weekly: Sky Valley Education Center Inspection

Kim, if you put this in the weekly, I'll approve it.

Lisa McArthur  
Manager, RCRA & Tanks Branch  
Land, Chemical and Redevelopment Division  
Region 10, U.S. Environmental Protection Agency  
1200 Sixth Avenue, Suite 155, MS 15-H04  
Seattle, WA 98101-3123  
(206) 553-1814

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**From:** Ogle, Kimberly <Ogle.Kimberly@epa.gov>  
**Sent:** Wednesday, October 9, 2019 4:38 PM  
**To:** Hamlin, Tim <Hamlin.Tim@epa.gov>  
**Cc:** McArthur, Lisa <McArthur.Lisa@epa.gov>; Davies, Lauris <Davies.Lauris@epa.gov>  
**Subject:** LAST MINUTE SUBITTAL for The Weekly: Sky Valley Education Center Inspection

Tim: is this an FYI to you kind of weekly or should I have put this type of item in the Regional Weekly for your approval?

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**From:** Mullin, Michelle <Mullin.Michelle@epa.gov>  
**Sent:** Wednesday, October 9, 2019 4:36 PM  
**To:** Ogle, Kimberly <Ogle.Kimberly@epa.gov>  
**Subject:** Item for The Weekly: Sky Valley Education Center Inspection

Hello Kim- Whenever there is a new action about this school, I submit a write up for The Weekly. Below is the latest info:

Sky Valley Education Center-

The PCB Program will inspect Sky Valley Education Center the week of Oct 22, 2019. The school was approved to dispose of PCB products, including fluorescent light ballasts and caulk, in 2016. The approval also required long-term monitoring. All monitoring results submitted by the school to EPA demonstrated compliance. However, in early 2019 plaintiffs suing the school shared new information with EPA indicating that some PCBs may remain on site, including some sources the school previously stated were disposed. The school has not been forthcoming with answers to EPA's questions, prompting the need for a TSCA Inspection. Kendall Moore from the Region 5 PCB Program will perform the inspection

and Michelle Mullin, Region 10 PCB Coordinator will accompany him. Contact: Michelle Mullin, [mullin.michelle@epa.gov](mailto:mullin.michelle@epa.gov), 206-553-1616

FYI- below are the previous submissions related to this newest round of information:

March 20, 2019

Sky Valley Education Center-

The EPA R10 PCB Program received a letter on Tuesday, March 19 from Sean Gamble, attorney for parents and teachers of Sky Valley Education Center (SVEC) in Monroe, WA. The letter states that in addition to testing for PCBs, they collected 6 samples for dioxins and furans and found elevated concentrations. Additionally, they describe that the highest concentration of PCBs was found on an item that a PCB fluorescent light ballast had previously leaked on and then was stored in a shed on school property. They allege that this may violate PCB storage for disposal timelines. There

**Ex. 5 Deliberative Process (DP)**

The PCB Program first became aware that testing recently found elevated levels of PCBs in the school and immediately referred the matter to R10 OCE recommending follow up inspection. EPA previously conducted an inspection at this school with an inspector from R5 based on complaints of leaking light ballasts. The school removed fluorescent light ballasts and replaced them with LED lights. The school also removed visible caulk and applied an epoxy sealant around windows where caulk may remain behind the frame. On 9-15-2017 the EPA R10 PCB Program issued an approval for the abatement work and required quarterly indoor air sampling for one year after abatement, as well as annual wipe sampling until the school was further renovated or the approval expired (May 25, 2022). All post-abatement sample results submitted to EPA have been less than 100 nanograms per cubic meter for indoor air or <10 ug/100cm<sup>2</sup> for wipes. The new samples appear to be in bulk dust, carpet fragments and tar droplets and indicate PCB concentrations above the unrestricted use cleanup level of 1ppm. Contact Michelle Mullin 3-1616.

March 13, 2019

Sky Valley Education Center-

The EPA R10 PCB Program received a call on Friday, March 8 from the Snohomish Health District with information that PCBs were recently found at the Sky Valley Education Center in Monroe, WA. The R10 PCB Program referred the matter to R10 OCE and recommended follow up inspection. EPA previously conducted an inspection at this school with an inspector from R5 based on complaints of leaking light ballasts. The school removed fluorescent light ballasts and replaced them with LED lights. The school also removed visible caulk and applied an epoxy sealant around windows where caulk may remain behind the frame. On 9-15-2017 the EPA R10 PCB Program issued an approval for the abatement work and required quarterly indoor air sampling for one year after abatement, as well as annual wipe sampling until the school was further renovated or the approval expired (May 25, 2022). All post-abatement sample results submitted to EPA have been less than 100 nanograms per cubic meter for indoor air or <10 ug/100cm<sup>2</sup> for wipes. The new samples appear to be in bulk dust, carpet fragments and tar droplets. Contact Michelle Mullin 3-1616.

Jan 4, 2018

On January 4, 2018 several news outlets reported that a parent group is suing the Monroe school district, state of Washington, and Monsanto over health concerns they have. The group is alleging that PCB contamination at the Sky Valley Education Center is the cause of the health concerns. EPA is currently responding to a FOIA request submitted by the law firm initiating the suit. Washington Department of Ecology has reached out to the PCB Program to ask for information. On September 15, 2017, the Office of Air and Waste issued a PCB risk-based disposal approval for the Sky Valley Education Center (SVEC) in the Monroe School District. The Region 10 PCB Coordinator worked closely with the SVEC and staff from Region 5 to complete this important work. The approval was a culmination of the coordinated effort begun in 2016 to remove and dispose of PCB contaminated materials found in the SVEC and was previously reported in the Weekly. Region 5 assisted with inspections of the school in 2016

**Ex. 5 Deliberative Process (DP)**

Based on reports submitted by the school, and inspection by Region 5, all PCB fluorescent light ballasts (FLBs) have been removed from the school. All visible, identified caulk with PCBs has also been removed. Where the potential for caulk to remain behind a window frame or other structural obstacle exists, an epoxy coating was put in place. Wipe sampling and air sampling throughout the school demonstrated no ongoing releases of PCBs following completion of abatement activities. The SVEC continues to conduct monitoring via wipe sample collection to ensure there are no PCB releases in the school. Michelle Mullin/PCB Coordinator/OAW

Thank you,

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Michelle Mullin | PCB Coordinator and Team Leader | pronouns: she, her  
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Land, Chemicals and Redevelopment Division  
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p: 206.553.1616 | [mullin.michelle@epa.gov](mailto:mullin.michelle@epa.gov)